

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:24-cr-20667
HON. DENISE PAGE HOOD

vs.

D-6 AKIA BROWN,

Defendant.

/

MOTION TO ALLOW TRAVEL WHILE ON PRE-TRIAL BOND

Now comes, Akia Brown, through her attorney, Patrick E. Nyenhuis, and requests, with the approval of the United States of America, that Ms. Brown be allowed to travel out of the country to celebrate her daughter's graduation.

1. Ms. Akia Brown is currently released on bond.
2. Ms. Akia Brown is being monitored by Pre-Trial Services.
3. Both Pre-Trial Services, through Officer Cunningham) and the United States Assistant Prosecuting Attorney do not object to allowing Ms. Brown to leave the country for this celebration.
4. In fact, the Assistant United States Attorney specifically said they Deferred to Pre-trial services and don't object. Concurrence was requested pursuant to the local court rules.
5. Ms. Brown will fly to Miami on July 16, 2025, in the evening.
 - a. Delta Flight from Atlanta to Miami.
6. Ms. Brown will return on July 21, 2025, leaving Miami at 3:30pm

- a. Spirit Flight from Miami to Atlanta.
7. On Thursday, July 17, 2025, Ms. Brown and her family members will board a Carnival Cruise scheduled to leave at 3:30pm.
8. On Friday, July 18, 2025, Ms. Brown will be on the Cruise ship the entire day.
9. On Saturday, July 19, 2025, Ms. Brown will be at Half Moon Cay in The Bahamas.
10. On Sunday, July 20, 2025, Ms. Brown will be in Nassau, in the Bahamas.
11. On Monday, July 21, 2025, the cruise ship is scheduled to dock about 8:00am.
 - a. More information can be provided if necessary.

WHEREFORE, based on the agreement of Pre-Trial Services and the United States of America's Assistant United States Attorneys, Defense respectfully requests that this Honorable Court GRANT Ms. Brown's request to travel out of the country with her family.

Respectfully submitted,

/s/ Patrick E. Nyenhuis _____
PATRICK ERWIN NYENHUIS
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DATE: July 9, 2025